

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

SB INITIATIVE, INC.,)	
)	
Plaintiff/Counter-Defendant,)	CIVIL ACTION NO. 3:24-cv-00821
)	
v.)	DISTRICT JUDGE ELI J.
)	RICHARDSON
CHEEKWOOD BOTANICAL GARDEN AND MUSEUM OF ART,)	MAGISTRATE JUDGE BARBARA D.
)	HOLMES
)	
Defendant/Counter-Plaintiff.)	JURY DEMAND
)	
)	

DECLARATION OF LUCIE WALLACE CAMMACK

I, Lucie Wallace Cammack, declare as follows:

1. My name is Lucie Wallace Cammack. I am over the age of 21 and am fully competent to testify regarding the facts set forth in this declaration. I am familiar with the facts and circumstances of the above-captioned proceeding, and make these statements based on personal knowledge.

2. The facts stated below are true and correct to the best of my knowledge.

3. I am a member of the Board of Trustees of Cheekwood Botanical Garden and Museum of Art.

4. On August 17, 2024, I ran into Melanie Baker. Earlier this year, Melanie had been announced as one of the co-chairs of the 2025 Swan Ball. Melanie told me that SB Initiative, Inc. is moving forward and is making an announcement on September 4 about the new beneficiary of their efforts. She said I would be pleased. I asked about using the branding "Swan Ball" and how could they use it given the current litigation. She told me that their attorney said that they could use it.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 29, 2024

Lucie Wallace Cammack
Lucie Wallace Cammack